

PSJ10 Exh 65



A subsidiary of Watson Laboratories, Inc.

TO: Customer Support Services
FROM: Lynn DaCunha
DATE: September 3, 2001
SUBJECT: DEA Excess/Max. Qty. - Suspicious Orders of Controlled Drugs

Order Processing will receive orders through EDI, faxes or manually from the Customer Service Representatives. Once these orders are entered, the system will compile a past history of control substances by each customer to establish a **12-month** average.

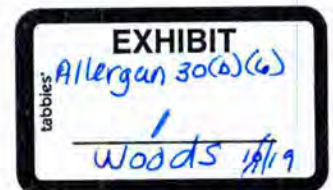
If a processed order generates a DEA excessive order flag due to more frequent or larger quantities than the customer's normal ordering pattern, Order Processing will first send a report to Marketing for their approval of the quantity. If Marketing approves the quantity, Order Processing will then generate a Suspicious Controlled Drug Order Investigation Report W-09-006.

The Suspicious form will have the 12-month average for each product. It will also contain the customer's name, address, DEA number, purchase order number, quantity ordered and if an EDI order the EDISO number.

The Suspicious form is then sent to the Customer Service Representative via e-mail. The CSR will review the Investigation Report, contact the customer to confirm the quantity and verify the reason for the larger quantity ordered. Once this investigation report is confirmed and verified by the customer, the Investigation Report is signed by the CSR and submitted to management for review.

Management determines whether the order can be released or deemed truly suspicious. If deemed unacceptable the order will not be placed and the DEA will be notified in extreme instances.

If the order is valid, confirmed and signed by management, the investigation report is returned to Order Processing to process.



Order Processing will file the copy of the Investigation Report W-09-006 with the customer's purchase orders.